

**Federal Defenders
OF NEW YORK, INC.**

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August 19, 2021

BY ECF

Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

So ordered.

/s/ Hon. Alvin K. Hellerstein
August 19, 2021

**Re: United States v. Windelson Montero,
21 Cr. 377 (AKH)**

Dear Judge Hellerstein:

I write with the consent of the government and Pretrial Services to request that the Court modify Mr. Montero's bail condition concerning his residence. Pursuant to this Court's July 29 bail modification order, Mr. Montero has been residing at Covenant House, a youth housing, education, food security, and vocational support program in Manhattan. Covenant House offers only temporary housing, however, and has now referred Mr. Montero within the shelter system to a residence in the Bronx, the address of which has been provided to Pretrial Services. Accordingly, I request that the Court authorize Mr. Montero's change of residence.

To avoid the need for future applications to the Court in the event that Mr. Montero is transferred again, I respectfully request that the conditions of Mr. Montero's bail be modified to require simply that his residence be approved by Pretrial Services.

As noted, the government and Pretrial Services consent to this request.

Respectfully submitted,

/s/

Clay H. Kaminsky
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cc: AUSA Matthew Weinberg
USPSO Joshua Rothman (by email)
USPSO Jonathan Lettieri (by email)